

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

2011 JAN 19 P 4:24

JON A. SANFILIPPO
CLERK

MANIYA ALLEN; LETRIYSA ALEXIS;
DAVEON ARCHIBOLD; DAMIAN
ARIAS; KWAMAMINE BARLOW;
KENNEDY BLAND; TYRON BRAZIL;
KEYSHAWN BROOM; LASHARIA
BROOM; NAQUINDA BROOM;
MERCEDES BROWN; PORSCHA
BROWN; TERRANCE BROWN; TEVIN
BROWN; TEVINE BROWN; SHATEIVIA
BRUCE; BRANDON BULLOCK;
LATONYA CANNON; HAZEL
CARABAJAL; ANJUAN COLEMAN;
JADAH CONNER; IAN COOPER;
DELANEO CRAIG; JOY CRAIG;
LUIS CURET; XAVIER CURRIE;
DIAMOND DAVIDSON; LEAH DAVIS;
DOMINIQUE DAVIS ; FELTON DODD ;
RIO DURAN; GRAI DURRAH;
ARLEATHA EVANS; GARQWAIN
EVANS; GEONANDRE EVANS;
JAMECIA EVANS; JAVION EVANS;
CHASIDY FARMER; MIKEL
FAYNE;NIGEL FAYNE; SHAMARRA
FERGUSON; DE'MARIO FLEMING;
CHARLES FORD, JR.; ISALAH
FRIEMOTH; CHESS GOODMAN, JR.;
CHARLIA GRANT; KEVIN HALL;
VANLISHA HAMMOND; JOMARA
HARDISON; LATOYA HARRIS; DONTA
HARVEY; AMBER HAUGEN-SCHMITT;
JOSHUA HAUGEN-SCHMITT;
ADRIANNA HEDWOOD; ARIEYANA
HEDWOOD; ADRAIN HENDRIX;
ANTHONY HENDRIX; RAUL
HERNANDEZ, JR.; DESHAWN
HEWINGS; SAVANNA
HEWINGS;AMBREA HOLDER; KAYLA
HOLLINS; LAQUISHA HOUSE; CELISA
HOUSTON; MAHOGANY HUGES-
HINTON; EARL DREANA HUGHES;
EDWARD HUGHES; TE' DREANA

COMPLAINT

Case No.

11-C-0055

HUGHES; A'NYA HUMPHRIES; FAITH
ITSALEUMSACK; JADA JAMISON;
BRITTANY JEFFERSON; LEROY
JENNINGS; ANTHONY JOHNSON;
KEITH JOHNSON; BRANDON
JOHNSON; QUA-SHAWN
JONES; RANESHA KEYES;
ANIYAH KIMBLE; JAVONTE KING;
MOET KNOWLES; DEJONE LAMPKIN;
CARMALE LEE; DONTREL LEE;
DONZEL LEE; ADAM LEEK;
CAMONIE LEWIS; EMAURIEON
LEWIS; ORZELL LONG; CRYESSE
LEWIS; NIGERIA LOVE; NAIZA LOVE-
ROY; ASHLEY MALONE; KALEEL
MCCRAY-CLARK; KIMANZI MCCRAY-
CLARK; TYANN MCHENRY;
YAHYNEZ MCHENRY; JEREMY
MCKINNEY; ESSENCE MCKINNIE;
DESHAYLA MILTON; MAKaelia
MISSOURI; MARSHEREE MISSOURI;
CHANTE MITCHELL; MARQUISE
MITCHELL; JYAIR
MURPHY; DEMOND'DRE MYERS;
CHRISTOPHER NASH; MARYEASHA
NEWSOME; DENVER NITSCH; KEITH
NORRINGTON; BENITA OATIS;
TITUS OWENS; SIEANA PLEESTER;
KATHLEEN RIMMER; KHADEDRA
RIMMER; SHAROD RIMMER;
SHYRELLE RIMMER;
TIEANNA RIMMER; MARTEZ
RODGERS; JACOB RUEDINGER;
JAMARA RUFFIN; PERRION RUFFIN;
TAILYIAH RUSH; CODY SCHWOCH;
MARSHIA SCOTT; QUINCY SCOTT;
SANTANA SCOTT; TALYIAH SCOTT;
TARAYIA SCOTT; MAURICE SLOAN,
JR.; SAMMIE SMITH; SHAMAR SMITH;
SHELIYAH SMITH; SHERELLE SMITH;
SHMYAH SMITH; SEDAN SMITH;
IYESHA SOUTHERN; BRIAN
STEWART; DESTINY STOKES;
DAWSON TAYLOR; GERALD, III

TENNANT; BRIAN THOMAS;
CAMARION THOMAS;
ANTHONY THOMPSON; D'ANGELO
THOMPSON; DESTINY THOMPSON;
DIJONAE TRAMMELL; TY'JAI
TRAMMELL; JAQUAN TRAMMELL;
SYNGEON TURNER; QUENTELLA
WALKER; TERIONTAE WALKER; TINA
WEATHERSPOON; DANIEL WHELESS;
RANDALL WHITMORE; SINKUASHA
WHITMORE; JERRELL WILLIAMS;
JIM-MYA WILLIAMS; MAKAYLA
WILLIAMS; TYVONI WILLIAMS;
ISAIAH WILLIAMS, JR.; JAQUAIVIA
WILLIS; AND BRIANA ZARATE;

Plaintiffs,

vs.

AMERICAN CYANAMID CO.;
ARMSTRONG CONTAINERS, INC.;
E.I. DUPONT DENEMOURS &
COMPANY;.; NL INDUSTRIES, INC.,
THE ATLANTIC RICHFIELD
COMPANY; and THE SHERWIN-
WILLIAMS COMPANY

Defendants.

Now come the above-named Plaintiffs, by their attorneys, for a cause of action against the above- named defendants, and allege and shows to the Court as follows:

I. PARTIES

1. Each of the Plaintiffs join in this action pursuant to Rule 20 (a)(1) of the Federal Rules of Civil Procedure asserting their rights to relief arising out of the same series of transactions and occurrences and said rights to relief giving rise to numerous common questions of law and fact as alleged below.

2. Letriysa Alexis is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3507 Queen Avenue N Minneapolis MN. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2648 North 2nd Street 2238 North 5th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 37 on 8/31/1994.
3. Maniya Allen is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2461 West Monroe Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (4658 North Hopkins Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 34 on 7/24/2003.
4. Daveon Archibold is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 8105 West Hampton, #4 Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (

3954 North 72nd Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 20 on 1/28/2002.

5. Damian Arias is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 285 East 171st Street Bronx NY. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1126 South 11th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 34 on 2/22/1999.
6. Kwamaine Barlow is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 1320 N 43rd Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1320 North 43rd Street, Apt. A) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead

carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 28 on 8/4/2003.

7. Kennedy Bland is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3741 North 24th Place Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3741 North 24th Place), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 26 on 7/27/2005.
8. Tyron Brazil is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 4877 North 55th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2524 North 32nd Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 44 on 6/8/1994.
9. Keyshawn Broom is a minor and was a resident of the State of Wisconsin at all times

material to the allegations in this Complaint, and currently resides at 2606 North 18th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2604 North 18th Street, Apt 5 1300 West Wright Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 7/25/2005.

10. Lasharia Broom is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2606 North 18th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2604 North 18th Street, Apt 5 1300 West Wright Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 27 on 9/1/2005.

11. Naquinda Broom is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2606 North 18th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2604 North 18th Street, Apt 5 1300 West Wright Street) , which contained surfaces

which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 13 on 8/14/2006.

12. Mercedes Brown is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2233 North 6th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2455 North 5th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 15 on 9/5/1997.

13. Porscha Brown is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2233 North 6th St. Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2455 North 5th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the

Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 20 on 4/27/2001.

14. Terrance Brown is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3052A North 26th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2403 North 20th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 24 on 7/25/1995.

15. Tevin Brown is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2442 North 28th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2525 North 44th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 24 on 9/8/1995.

16. Tevine Brown is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2442 North 28th Street Milwaukee

WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2525 North 44th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 58 on 4/28/1999.

17. Shateivia Bruce is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 602 West Center Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (602 West Center Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 20 on 8/12/2005.

18. Brandon Bullock is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3234 North 24th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1531 North 29th Street 3121 Buffman Street 3253 North 24th Street 3540 North 20th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or

sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 52 on 8/11/1998.

19. Latonya Cannon is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3030 N. 21st Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2962 North 18th Street 3030 North 21st Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 84 on 6/2/1994.

20. Hazel Carabajal is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2072 South 35th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2072 S 35th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 33 on

8/17/2005.

21. Anjuan Coleman is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 1109 West Keefe Avenue Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2477 North 44th Street 1109 West Keefe Avenue) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 85 on 7/28/2005.

22. Jadah Conner is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2741 North 45th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2741 N 45th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 32 on 7/1/03.

23. Ian Cooper is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2479 North 69th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3342 North 26th

Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 31 on 7/19/1999.

24. Delaneo Craig is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2821 North Hubbard Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1720 North 37th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 11/17/2003.

25. Joy Craig is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2821 North Hubbard Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1905 West Chambers Street 1313 West Cherry Street 1547 North 35th Street 2821 North Hubbard) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the

Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 18 on 8/12/1999.

26. Luis Curet is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 1813 South 19th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1813 South 19th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 34 on 0/0/1999.

27. Xavier Currie is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 5800 North 91st Street Apt. #4 Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2448 North 39th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 53 on 7/28/1999.

28. Diamond Davidson is a minor and was a resident of the State of Wisconsin at all times

material to the allegations in this Complaint, and currently resides at 4879 North 19th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (4879 North 19th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 33 on 5/3/2004.

29. Leah Davis is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3356 North 21st Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3356 North 21st Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 6/29/2005.

30. Dominique Davis is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3507 Queen Avenue N Minneapolis MN. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2648 North 2nd Street 2238 North 5th Street.3918 North 29th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was

manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 20 on 8/8/1994.

31. Felton Dodd is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 4126A. Burleigh Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1610 North 35th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 53 on 8/4/1993.

32. Rio Duran is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2829 North 50th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2829 North 50th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 23 on 8/18/2005.

33. Grai Durrah is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3417 North 4th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2205 North 37th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 7/22/1998.

34. Arleatha Evans is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2455 West Medford Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2114 North 36th Street 2341 North 14th Street 2455 West Medford Avenue) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 7/22/2003.

35. Garqwain Evans is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3215 North 20th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3241 North 34th Street) , which contained surfaces which were coated with paint containing

white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 52 on 5/3/2005.

36. Geonandre Evans is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3215 North 20th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3241 North 34th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 25 on 5/3/2005.

37. Jamecia Evans is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2455 West Medford Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2600 West Walnut Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead

carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 17 on 10/6/1995.

38. Javion Evans is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2455 West Medford Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2455 West Medford Avenue) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 16 on 1/11/2006.

39. Chasidy Farmer is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2618 North 28th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (219 E. Burleigh Street 2879 North 29th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 71 on 3/15/1996.

40. Mikel Fayne is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3412 West Rohr Avenue Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2832 West Wisconsin Avenue) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 12 on 12/21/2001.

41. Nigel Fayne is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3412 West Rohr Avenue Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2832 West Wisconsin Avenue) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 20 on 9/15/1995.

42. Shamarra Ferguson is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 6442 North 106th Street, #3 Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee,

Wisconsin (2659 North 41st Street 5046 North 84th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 44 on 3/18/1997.

43. De'Mario Fleming is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 414 East Concordia Street-Upper Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (414 E. Concordia Avenue) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 26 on 4/6/2005.

44. Charles Ford, Jr. is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2726 West Melvina Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2726 West Melvina Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that

Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 18 on 7/26/2007.

45. Isaiah Friemoth is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 426 South Quincy Street Apt. 4 Green Bay WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (961 Velp Ave LWR APT Greenbay Wisconsin 54303 1740 Western Ave Apt #Greenbay Wisconsin 54303) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 52 on 3/31/2005.

46. Chess Goodman, Jr. is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 414 East Concordia Street-Upper Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2125 North 38th Street 2558 North Buffum Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead

poisoning caused a peak elevated blood lead level of 13 on 9/20/1999.

47. Charlia Grant is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2921 North 6th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2921 North 6th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 24 on 3/7/2005.

48. Kevin Hall is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2821 North Hubbard Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2013 North 32nd Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 33 on 8/10/1999.

49. Vanlisha Hammond is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2409 West Lloyd Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3222 North 12th Street) , which contained surfaces which were coated with paint containing

white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 33 on 6/23/1993.

50. Jomara Hardison is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 6330 West Florist Avenue Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3039 North Buffum Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 78 on 8/4/1995.

51. Latoya Harris is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2474 North 39th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3904 North Port Washington Avenue 2329 North 44th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said

white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 49 on 9/6/1995.

52. Donta Harvey is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2233 North 6th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2455 North 5th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 27 on 10/15/2002.

53. Amber Haugen-Schmitt is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 1247A South 15th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1247 South 15th Street, Apt. A) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 32 on 10/19/04 & 1/19/05.

54. Joshua Haugen-Schmitt is a minor and was a resident of the State of Wisconsin at all times

material to the allegations in this Complaint, and currently resides at 1247A South 15th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1247 South 15th Street, Apt. A), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 39 on 1/10/2006.

55. Adrianna Hedwood is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 5306 North 35th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (5306 North 35th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 17 on 8/5/2005.

56. Arieyana Hedwood is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 5306 North 35th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (5306 North 35th Street), which contained surfaces which were coated with paint containing

white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 31 on 8/3/2005.

57. Adrain Hendrix is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 516 Lime Kiln Road Green Bay WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2664 North 20th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 35 on 10/17/1996.

58. Anthony Hendrix is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 516 Lime Kiln Road Green Bay WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2664 North 20th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate

pigments. Said lead poisoning caused a peak elevated blood lead level of 35 on 7/13/1995.

59. Raul Hernandez, Jr. is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3013 S 15th Place Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2255 South 16th Street 2004 South 16th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 31 on 10/7/2003.

60. Deshawn Hewings is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 714 West Summer Street Apt. 450 Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2561A North 14th Street 2561 North 14th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 50 on 7/10/1995.

61. Savanna Hewings is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 714 West Summer

Street Apt. 450 Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2561 North 14th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 12 on 8/2/1999.

62. Ambrea Holder is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 6450 North 45th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2767 North 8th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 25 on 5/23/1995.

63. Kayla Hollins is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 1917 North 7th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2133 North 47th Street 2614 North 46th Street 2319 North 5th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured,

processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 34 on 9/10/2002.

64. Laquisha House is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 917 South 25th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1537 South 12th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 33 on 6/27/2002.

65. Celisa Houston is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 1333 North 24th Place Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1333 North 24th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead

carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 7/22/2005.

66. Mahogany Huges-Hinton is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 4616 West Rice Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (4945 West Medford Avenue) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 50 on 10/19/1996.

67. Earldreana Hughes is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 414 East Concordia Street-Upper Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (414 E. Concordia Avenue) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 19 on 11/14/2005.

68. Edward Hughes is a minor and was a resident of the State of Wisconsin at all times material

to the allegations in this Complaint, and currently resides at 414 East Concordia Street-Upper Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (414 E. Concordia Avenue) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 13 on 2/3/2005.

69. Te' Dreana Hughes is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 414 East Concordia Street-Upper Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (414 E. Concordia Avenue) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 13 on 2/1/2005.

70. A'nya Humphries is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3132 West National Avenue Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3132 West National Avenue) , which contained surfaces which were coated with paint

containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 25 on 7/18/2005.

71. Faith Itsaleumsack is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 24455 9th Place Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1539 South 15th Street 2445 South 9th Place) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 44 on 9/6/2003.

72. Jada Jamison is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 6450 North 45th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2767 North 8th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the

Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 25 on 8/24/1995.

73. Brittany Jefferson is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3412 West Rohr Avenue Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2832 West Wisconsin Avenue) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 21 on 7/21/1994.

74. Leroy Jennings is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2924 Arcardia Terrace Rockford IL. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2817 North 2nd Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 71 on 5/28/1993.

75. Anthony Johnson is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 1823 South 23rd Street, #1

Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1921 South 19th Street 1320 South 25th Street Supplemental 1832 South 23rd Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 8/16/2005.

76. Keith Johnson is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 1826 North 39th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1862 North 39th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 21 on 6/30/2003.

77. Brandon Johnson is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3346 North 17th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3123 North 41st Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff

resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 90 on 6/23/1994.

78. Qua-Shawn Jones is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 1908 Hillcrest Avenue Rockford IL. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (502 North 32nd Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 40 on 5/19/2004.

79. Ranesha Keyes is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3052 North 9th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2722 North 34th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 39 on

5/11/1999.

80. Aniyah Kimble is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3724-A North 5th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3724 A North 5th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 28 on 10/14/2002.

81. Javonte King is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 4934 North 73rd Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3328 North 26th St 3357 North 20th St) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 18 on 4/27/2004.

82. Moet Knowles is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2641 North 25th Street Milwaukee

WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2434 North 53rd Street, A) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 31 on 8/28/2003.

83. Dejonge Lampkin is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3203A North 16th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2663 North Martin Luther King Drive) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 40 on 4/12/2004.

84. Carmale Lee is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3231 North 24th Place Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3231 North 24th Place 3239 North 24th Place 3321 North 12th Street, A) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the

Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 7/29/2004.

85. Dontrel Lee is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 1931 North 37th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1931 North 37th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 40 on 8/11/2005.

86. Donzel Lee is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 1931 North 37th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1931 North 37th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 45 on 7/21/2006.

87. Adam Leek is a minor and was a resident of the State of Wisconsin at all times material to

the allegations in this Complaint, and currently resides at 2009 Conner Road Hampton VA. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1352 Liberty Street, LaCrosse (LaCrosse)) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 45 on 6/10/2000.

88. Camonie Lewis is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3457 North 13th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3457 North 13th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 61 on 8/3/2007.

89. Emaurion Lewis is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3068 North 44th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (5523 North 37th Street) , which contained surfaces which were coated with paint containing

white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 24 on Jun-05.

90. Orzell Long is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2821 North Hubbard Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1720 North 37th St 2821 North Hubbard Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 4/6/2005.

91. Cyresse Louis is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2114 16th Street Racine WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (710 Kewaunee Street, Racine WI) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate

and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 37 on 3/1/2008.

92. Nigeria Love is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3412 West Rohr Avenue Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2832 West Wisconsin Avenue) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 36 on 7/28/1998.

93. Naiza Love-Roy is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2969 North 37th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2629 North 37th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 37 on 1/25/2004.

94. Ashley Malone is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2737 North 23rd Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1119 Keefe Ave 8005 West Bender Avenue 9426 West Sheridan Ave 6460 North 69th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 12 on 11/1/1994.

95. Kaleel McCray-Clark is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 5121 North 53rd Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2429 West Nash Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 77 on 7/21/2005.

96. Kimanzi McCray-Clark is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 5121 North 53rd Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (

2429 West Nash Street 3937 North 23rd Street 2119 North 35th Street 3423 North 5th Street Apt. C) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 45 on 7/27/2005.

97. Tyann McHenry is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 317 East Chambers Street, Upper Floor Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2815 North 34th Street 2820 North 35th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 26 on 4/26/2000.

98. Yahynez McHenry is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2128 North 41st Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2815 North 34th Street 2128 North 41st Street 2627 North 36th Street 2618 North 41st Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or

sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 32 on 10/17/2002.

99. Jeremy McKinney is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 4424 North 63rd Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2539 North Holton Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 44 on 10/5/1999.

100. Essence McKinnie is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2477 West Auer Avenue Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2477 West Auer Avenue) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 30

on 8/30/2004.

101. DeShayla Milton is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2133 North 47th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2326 North 12th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 47 on 3/30/2005.

102. Gabriel Miranda is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 150 A. South 23rd Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (713 West Bruce Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 30 on 11/30/2007.

103. Makaelia Missouri is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2921 North 6th Street

Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2921 North 6th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 26 on 8/26/1998.

104. Marsheree Missouri is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2921 North 6th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2921 North 6th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 11 on 9/15/1999.

105. Chante Mitchell is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2428 West Burliegh Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1030 South 12th Street 2472 North 51st Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed,

marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 44 on 11/5/1998.

106. Marquise Mitchell is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2428 West Burliegh Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1030 South 12th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 37 on 2/11/1999.

107. Jyaire Murphy is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 5120 West Center Street Apt. 1 Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3940 West Lisbon Ave 1753 North 32nd Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be

poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 23 on 8/11/2005.

108. Demond'dre Myers is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 10818 West Cameron Milwaukee WV. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2507 North 9th Street 2505 North 9th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 26 on 8/9/2005.

109. Christopher Nash is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3361 North 22nd Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1536 North 35th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 23 on 2/21/1994.

110. Maryeasha Newsome is a minor and was a resident of the State of Wisconsin at all times

material to the allegations in this Complaint, and currently resides at 3658 North 20th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3221 North 14th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 33 on 7/16/1996.

111. Denver Nitsch is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 806 West Howard Avenue Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (9418 North Greenbay Road), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 29 on 8/26/1999.

112. Keith Norrington is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 6124 West Spencer Place Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2533 North 38th Street, Upper 2119 North 44th Street), which contained

surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 50 on 8/11/1993.

113. Benita Oatis is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2269 South 16th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2112 North 36th Street 2316 North Hubbard Street 2430 North 32nd Street 6236 West Kaul Ave) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 25 on 10/2/1992.

114. Titus Owens is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3010 N 22nd Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2861 North 24th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the

Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 43 on 4/6/2001.

115. Sieana Pleester is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 1914 South 6th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1914 South 6th Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 26 on Sep-03.

116. Kathleen Rimmer is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2647 North 17th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (26 North 17th Street 2628 North 9th Street #A2864 North 11th Lane), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 14 on 8/21/2001.

117. Khadedra Rimmer is a minor and was a resident of the State of Wisconsin at all times

material to the allegations in this Complaint, and currently resides at 2647 North 17th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (26 North 17th Street 2628 North 9th Street #A2864 North 11th Lane.) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 32 on 8/3/1999.

118. Sharod Rimmer is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2172 North 46th Street Milwaukee WV. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2726 West Clarke Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 39 on 8/3/1995.

119. Shyrelle Rimmer is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2647 North 17th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (26 North 17th Street 2628 North 9th Street #A2864 North 11th Lane.) , which contained

surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 27 on 9/28/2000.

120. Tieanna Rimmer is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2647 North 17th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (26 North 17th Street 2628 North 9th Street #A2864 North 11th Lane.) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 32 on 9/28/00 & 8/21/01.

121. Martez Rodgers is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3658 North 20th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2703 West Clarke Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead

carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 34 on Oct-98.

122. Jacob Ruedinger is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 5838 West Scott Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2934 South 15th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 27 on .

123. Jamara Ruffin is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 4407 West Clarke Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (4407 West Clarke Street 5810 West Fond Du Lac Avenue) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 28 on 8/10/2005.

124. Perrion Ruffin is a minor and was a resident of the State of Wisconsin at all times

material to the allegations in this Complaint, and currently resides at 4934 North 73rd Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3357 North 20th St 3357 North 20th St) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 41 on 02/05/2003.

125. Tailyiah Rush is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2823 North 44th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1449 North 37th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 36 on 10/1/2009.

126. Cody Schwoch is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 554 Poppy Lane Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (516 Dodge Street, Eau Claire, WI) , which contained surfaces which were coated with paint

containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 55 on Apr-93.

127. Marshia Scott is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3028 West Mt. Vernon Avenue, Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2427 West Juneau Avenue) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 48 on 9/18/1998.

128. Quincy Scott is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3028 West Mt. Vernon Avenue, Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2122 North 34th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate

and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 24 on 9/9/1995.

129. Santana Scott is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2770 North 39th A. Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3504 West Sarnow Street 2770 North 39th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 42 on 6/22/1999.

130. Taliyah Scott is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2770 North 39th A. Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2770 North 39th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 11 on 11/20/2003.

131. Tarayia Scott is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2770 North 39th A. Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3504 West Sarnow Street 2770 North 39th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 29 on 6/22/1999.

132. Maurice Sloan, Jr. is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3460 North 14th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3350 North 14th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 48 on 10/7/2002.

133. Sammie Smith is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2951 North 21st Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (

401/403 East Chambers Street 2968 North Buffum Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 23 on 4/27/2001.

134. Shamar Smith is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2951 North 21st Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1315 West Cherry Street 2561 North 15th Street 2951 North 21st Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 40 on 7/23/2003.

135. Sheliyah Smith is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2951 North 21st Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (401/403 East Chambers Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that

Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 8/24/2000.

136. Sherelle Smith is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 4613 West Marion Street Unit 81 Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1218 West Walnut Street 2933 North 27th Street 3203 West Senator Avenue 804 South 21st Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 61 on 7/26/1996.

137. Shmyah Smith is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2951 North 21st Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1315 West Cherry Street 2561 North 15th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead

level of 21 on 8/1/2005.

138. Sedan Smith is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 4613 West Marion Street Unit 81 Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1218 West Walnut Street 2933 North 27th Street 3203 West Senator Avenue 804 South 21st Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 40 on 3/10/1995.

139. Iyesha Southern is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 1109 West Keefe Avenue Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2477 North 44th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 13 on Oct-05.

140. Brian Stewart is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 1109 West Keefe Avenue

Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2477 North 44th Street 1109 West Keefe Avenue) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 35 on 7/30/2005.

141. Destiny Stokes is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 1229 North 33rd Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3027 West Clybourne Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 36 on 9/29/1995.

142. Dawson Taylor is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 3417 North 4th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3206 West Senator Avenue 3417 North 4th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed,

marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 32 on 6/18/2004.

143. Gerald, III Tennant is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 223 Farnsworth Avenue O'Connell WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (221 1/2 East First Street, Gillett, WI) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 52 on 11/24/2003.

144. Brian Thomas is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2745 A North Richard Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2745 A North Richard Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of

said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 2/2/2006.

145. Camarion Thomas is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2745 A North Richard Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2745 A North Richard Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 38 on 12/23/2005.

146. Anthony Thompson is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 4424 North 63rd Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2539 North Holton Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 36 on 10/9/1997.

147. D'Angelo Thompson is a minor and was a resident of the State of Wisconsin at all times

material to the allegations in this Complaint, and currently resides at 3703 North 20th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3703 North 20th St 3818 North 25th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 38 on 12/2/1999.

148. Destiny Thompson is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2954 North 19th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1900 West Chambers Street 2954 North 19th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 21 on 1/15/2003.

149. Dijonae Trammell is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 149 Green Street Toccoa GA. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2909 North 35th Street) , which contained surfaces which were coated with paint containing

white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 15 on 8/21/1997.

150. Ty'Jai Trammell is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 149 Green Street Toccoa GA. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2909 North 35th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 11 on 8/20/1997.

151. Jaquan Trammell is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 149 Green Street Toccoa GA. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2909 North 35th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate

and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 32 on 8/21/1997.

152. Syngeon Turner is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2418 A West Keefe Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2111 North 27th St) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 43 on 2/14/1994.

153. Quentella Walker is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 1127C North 12th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1127 North 12th Street, Apt. C) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 8/6/2002.

154. Teriontae Walker is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 5379A North 84th St Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2316 West Galena Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 27 on 8/20/2002.

155. Tina Weatherspoon is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2958 #A North 18th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2958A North 18th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 33 on 7/17/1992.

156. Daniel Wheless is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 712 24th Avenue East Superior WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (712

East 24th Avenue, Superior, WI) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 25 on 4/3/2002.

157. Randall Whitmore is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2606 North 18th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2113 West Center Street 2550 North 22nd Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 17 on 12/12/2001.

158. Siquasha Whitmore is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2606 North 18th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2113 West Center Street 2550 North 22nd Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the

time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 16 on 5/29/2001.

159. Jerrell Williams is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 1921 West Keefe Avenue Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1921 West Keefe Avenue, #A), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 30 on 11/15/2002.

160. Jim-Mya Williams is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2925 North 26th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2321 N 41st Street), which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 26 on

6/13/2000.

161. Makayla Williams is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2925 North 26th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2925 North 26th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 12/7/2004.

162. Tyvoni Williams is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 2904 West Clark Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (2541 North 45th Street 3353 North 22nd Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 22 on 7/23/2004.

163. Isaiah Williams, Jr. is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 4614 North Teutonia

#104 Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (3202 North 42nd Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 47 on 8/9/2005.

164. Jaquaivia Willis is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 5121 North 32nd Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1934 North 49th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 53 on 7/16/1999.

165. Briana Zarate is a minor and was a resident of the State of Wisconsin at all times material to the allegations in this Complaint, and currently resides at 1033 South 18th Street Milwaukee WI. Plaintiff previously occupied the residence(s) in Milwaukee, Wisconsin (1033 South 18th Street 1550 South 7th Street) , which contained surfaces which were coated with paint containing white lead carbonate pigment that was manufactured, processed,

marketed, promoted, supplied, distributed and/or sold by the Industry Defendants. At the time that Plaintiff resided at said premises, the Plaintiff was exposed to and did ingest said white lead carbonate and the Plaintiff continued to be poisoned by the ongoing ingestion of said white lead carbonate pigments. Said lead poisoning caused a peak elevated blood lead level of 45 on 7/9/2004.

166. American Cyanamid Company ("American Cyanamid") is being sued in its own capacity and is a Maine corporation with its principal place of business in New Jersey.
167. Armstrong Containers, Inc. ("Armstrong") is being sued in its capacity as the successor-in-interest to the John R. MacGregor Co. and the MacGregor Lead Company, and is a Delaware corporation with its principal place of business in Georgia.
168. E.I. DuPont DeNemours & Company ("DuPont") is a Delaware corporation with its principal place of business in Delaware.
169. NL Industries, Inc. ("NL Industries") formerly known as the National Lead Company, is a New Jersey corporation with its principal place of business in Texas.
170. The Atlantic Richfield Company ("ARCO"), the successor-in-interest to International Smelting and Refining Company, Anaconda Lead Products Company, Anaconda Sales Company, Anaconda Copper Mining Company, and International Lead Refining Company, is a Delaware corporation with its principal place of business in Illinois.
171. The Sherwin-Williams Company ("Sherwin-Williams") is an Ohio corporation with its principal place of business in Ohio.
172. At all pertinent times, American Cyanamid, Armstrong, DuPont, NL Industries, ARCO and Sherwin-Williams (hereafter referred to collectively as "Industry Defendants") together with their agents, servants, employees, alter egos, and predecessor corporations,

manufactured, processed, marketed, promoted, supplied, distributed and/or sold white lead carbonate pigments for use in residential paints and coatings in the State of Wisconsin, including the municipalities of Milwaukee, Gillett, LaCrosse, and Racine, as well as surrounding communities.

II. THE FACTS

173. The white lead carbonate pigment manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants was and is a defective and unreasonably dangerous product.

174. Specifically, the white lead carbonate manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants is unreasonably dangerous because the hidden risks of exposing children to white lead carbonate causes the childhood disease of lead poisoning, as well as additional severe and permanent injuries, including, but not limited to learning disabilities, decrements in intelligence, and deficits in a wide range of neuropsychological functioning, including visual motor skills, fine motor skills, verbal skills, attention and concentration, memory, comprehension and impulse control. Exposure of children to white lead carbonate can also cause coma, seizure and death.

175. All of the white lead carbonate residential paint pigments manufactured, processed, marketed, promoted, supplied, distributed and/or sold by the Industry Defendants were functionally interchangeable, physically indistinguishable, identically defective and unreasonably dangerous.

176. Each Plaintiff is unable to identify the specific manufacturer, supplier and/or distributor of the white lead carbonate pigments present in the residence in which he or she was exposed

and in which he or she ingested said pigments. Each Plaintiff's inability to identify the manufacturer, supplier and/or distributor of the white lead carbonate pigment was not and is not the fault of said Plaintiff.

177. The white lead carbonate pigments manufactured, promoted, and sold by the Industry Defendants were in a condition not contemplated by the ultimate consumer and were dangerous to an extent beyond that which was contemplated by the ordinary consumer.

178. Each Plaintiff ingested lead derived from all paint layers containing white lead carbonate pigments in each residence at which Plaintiff was exposed and said lead was ingested, *inter alia*, through direct ingestion of paint chips containing white lead carbonate pigments in multiple layers, direct gnawing, chewing and sucking on intact accessible surfaces such as window sills and wood work covered with multiple layers of paint containing white lead carbonate pigments, and chronic and cumulative ingestion of dust containing lead derived from multiple layers of paint containing white lead carbonate pigments. In each exposure residence all the layers of paint containing white lead carbonate pigments combined to create a unified and indivisible risk of harm.

179. Although the use of all leaded pigments was banned in the United States in 1978, white lead carbonate pigments are still present in and on many homes, schools, hospitals and other public and private buildings throughout the State of Wisconsin, including the premises at which each Plaintiff was exposed to and ingested lead derived from white lead carbonate pigments.

180. Each Industry Defendant knew and/or should have known since at least the early 1900's that white lead carbonate pigments are hazardous to human health, and in particular to children. For example, in an 1881 booklet entitled "Paints and Painting," Sherwin-Williams

wrote:

“While it is true that carbonate of lead possesses some of the best elements of paint, it is also true that in other respects it is defective.”

In another example, in its employee newsletter for the month of January 1900, Sherwin-Williams published the following statement:

“It is also familiarly known that white lead is a deadly cumulative poison, while zinc is innocuous. It is true, therefore, that any paint is poisonous in proportion to the percentage of lead contained in it.”

In an additional example, in its employee newsletter for the month of May, 1915, Sherwin-Williams published the following statement:

“White lead . . . has some fatal defects, chief of which is the tendency to ‘chalk’ off after exposure for a year or two.”

181. Each Industry Defendant also knew and/or should have known that, at all relevant times, there existed safer alternatives to the use of white lead carbonate as a pigment for residential paints and coatings.

182. In 1971, after decades of medical research had unambiguously implicated lead pigments, including white lead carbonate, as the major contributing force in childhood lead poisoning, and at a time when the majority of paint and pigment manufacturers had ceased production of white lead carbonate, American Cyanamid entered the white lead carbonate market.

183. Beginning on June 1, 1971, American Cyanamid began to manufacture white lead carbonate pigments specifically intending that said pigments be used by Armstrong Chemcon, Inc., in its Scotch Laddie line of exterior residential paints which consisted of 85% pure white lead carbonate and which was sold and distributed in the State of Wisconsin and the City of Milwaukee. The Scotch Laddie line of residential paints containing high

concentrations of pure white lead carbonate pigments continued to be sold and advertised in Wisconsin through 1973.

184. Despite their knowledge that white lead carbonate pigment was unreasonably dangerous and hazardous to human health, each of the Industry Defendants continued to manufacture, process, market, promote, supply, distribute and/or sell white lead carbonate pigments, failed to warn of the hazardous nature of white lead carbonate pigment, and failed to adequately test white lead carbonate pigments.

185. Each of the Industry Defendants also contributed to the creation of a risk of harm to children when it failed to disclose the hazardous nature of white lead carbonate pigments and instead marketed and represented its paint products containing white lead carbonate pigments as safe.

186. Specifically, the Industry Defendants engaged in promotional campaigns that failed to disclose the dangers of using white lead carbonate pigments in residential paints and coatings and of exposing children to paint and coatings products containing white lead carbonate. Further, the Industry Defendants marketed paints and coatings containing white lead carbonate pigments as products that fostered health and well-being and that could be used safely on interior and exterior surfaces where the presence of children was likely.

187. Despite the knowledge of each of the Industry Defendants regarding the hazards of white lead carbonate when used as a pigment in residential paint, each failed to disclose the dangers of using white lead carbonate pigments in residential paints and coatings and of exposing children to paint and coatings products containing white lead carbonate pigments.

188. Instead, for decades the Industry Defendants marketed white lead carbonate as a safe product that fostered health and well-being and promoted white lead as a pigment for use in

areas inhabited by children.

189. Each of the Industry Defendants also contributed to the creation of the risk of harm to the Plaintiff through participation in trade associations such as the Lead Industries Association (“LIA”) and the National Paint, Varnish, & Lacquer Association (NPVLA), and said activity included, *inter alia*, marketing white lead carbonate as a pigment in paint through misleading advertisements and promotions.

190. Furthermore, the Industry Defendants contemplated that the paint products they manufactured, including those containing white lead carbonate pigments might cause personal injuries for which they may be liable. For example, on January 28, 1936, the National Paint, Varnish and Lacquer Association, Inc. (NPVLA), advised various Industry Defendants, including Sherwin-Williams and E.I. DuPont, that:

“during the past few years many claims for bodily injury, illness or death have been brought against members of the paint industry from causes claimed to have arisen through the use of the products of the industry and advised that a type of insurance has been developed to protect members of the industry against this [h]azard.”

The NPVLA further advised that:

“ the Scientific Section of the Association had been urging the adoption of caution lables for the past twenty years, the that the Association had received little cooperation from members of the industry in this particular filed.”

191. The LIA is not a party because it is presently under the protection of the bankruptcy laws in the United States. From at least 1928 through the events material to allegations of this complaint, the LIA was the agent, servant, employee, alter ego, aider and abettor of one or more of the Industry Defendants and acted individually and/or within the scope of its agency,

servitude and employment in promoting and marketing white lead carbonate products used as a pigment in paints and coatings for residential use in the State of Wisconsin during the relevant time period.

192. Through the LIA and NPVLA, each of the Industry Defendants also sought to suppress all unfavorable information and publicity about white lead carbonate pigments without regard for the truth of such information and despite its own contrary knowledge about the severe hazards posed by white lead carbonate when used as a pigment in paint.

193. As a result of the intentional, negligent and other wrongful conduct of the Industry Defendants in manufacturing, processing, marketing, promoting, supplying, distributing and/or selling white lead carbonate residential paint pigments, said defective and unreasonably dangerous product was present in and on each of the residences at which each Plaintiff ingested lead derived from white lead carbonate pigments as alleged in the preceding paragraphs of this Complaint.

194. At all relevant times, the conduct of the Industry Defendants was malicious and in reckless and/or intentional disregard for the rights of the Plaintiff.

195. As a direct and proximate result of these and other wrongful actions by the Industry Defendants, each of the Plaintiffs has suffered the injury of lead poisoning, as well as severe and permanent sequelae, including, but not limited to, great pain of body and mind and significant neuro-psychological deficits, past and future hospital and medical expenses, and impairment of each Plaintiff's ability to learn, live and enjoy life, all in an unspecified amount pursuant to Wisconsin Statutes.

FIRST CAUSE OF ACTION
Strict Liability of the Industry Defendants

196. The Plaintiffs re-allege and incorporate herein by reference the foregoing paragraphs of this Complaint.

197. The Industry Defendants have at all times material to this action been engaged in the business of manufacturing, promoting, selling, distributing, and/or supplying of white lead carbonate pigments which were used in the painting, staining, construction of, and the maintenance and remodeling of the residences at which each of the Plaintiff ingested white lead carbonate pigments.

198. The white lead carbonate pigments that each of the Plaintiffs were exposed to were in substantially the same condition as the pigments were in before leaving the control of each of the Industry Defendants.

199. At the time that the white lead carbonate pigments left the possession and control of the Industry Defendants, the pigments were a defective and unreasonably dangerous product because the Industry Defendants failed to provide an adequate warning, and when used in the manner in which the pigments were intended by the Industry Defendants and/or for the purpose that it was reasonably foreseeable that the pigments may have been used, the pigments caused substantial and severe injuries to each of the Plaintiffs.

200. The defective condition of the white lead carbonate manufactured, marketed, promoted, supplied, distributed and/or sold by Industry Defendants was a factor that substantially contributed to each of the Plaintiff's injuries.

SECOND CAUSE OF ACTION
Negligence of the Industry Defendants

201. The Plaintiff re-alleges and incorporates herein by reference the foregoing paragraphs of

this Complaint.

202. The Industry Defendants knew and/or should have known that white lead carbonate when used as a pigment in residential paints and coatings was harmful to children coming into contact with it.

203. Despite the knowledge that white lead carbonate pigments posed an unreasonable risk to the health and welfare of children exposed thereto, the Industry Defendants continued to manufacture, promote, sell, distribute, and/or supply white lead carbonate pigments which were used in and on each of the residences at which each Plaintiff ingested lead derived from white lead carbonate pigments as alleged in the preceding paragraphs of this Complaint.

204. At all times material hereto, the Industry Defendants were under an obligation of due care to refrain from any act which would cause foreseeable harm to others.

205. At all times material, the Industry Defendants were under a continuing duty to warn about the hazards and unreasonable dangers of their white lead carbonate pigment products.

206. The Industry Defendants also owed a heightened duty of care because their conduct directly impacted the health and welfare of children.

207. The Industry Defendants breached their duties by engaging in conduct that posed an unreasonable risk of harm, including, among other things:

- a. selling white lead carbonate pigments without an adequate warning to the general public, including but not limited to, consumers, ultimate users, retailers, wholesalers, third party paint manufacturers, and other intermediaries, of the dangerous characteristics thereof;
- b. continuing to fail to adequately warn the general public of the dangerous

characteristics of white lead carbonate pigments following the sale of its product through the present time;

- c. failing to adequately test white lead carbonate for use in residential paints and coatings; and/or
- d. continuing to manufacture, promote, sell, distribute, and/or supply white lead carbonate pigments for use in residential paints and coatings when they knew, or in the exercise of ordinary care, should have known that white lead carbonate was harmful to children and other persons coming into contact with it.

208. The negligence of the Industry Defendants was a factor that substantially contributed to the lead poisoning and other injuries caused to each of the Plaintiffs by the ingestion of white lead carbonate.

WHEREFORE each of the Plaintiffs demands judgment against each Industry Defendant, jointly and severally, as follows:

- 1. For each of the Plaintiffs in an unspecified amount pursuant to Wisconsin Statutes, including but not limited to compensatory;
- 2. For pre-judgment and post-judgment interest, together with the costs, disbursements of this action;
- 3. For any other remedy the court deems just and equitable under the circumstances.

EACH PLAINTIFF HEREBY DEMANDS A JURY TRIAL.

Dated at Milwaukee, Wisconsin, this 19th day of January, 2011.

LAW OFFICES OF PETER EARLE, LLC



s/ Peter G. Earle

Peter G. Earle (WI State Bar No. 1012176)
Attorney for Plaintiff
839 North Jefferson Street, Suite 300
Milwaukee, WI 53202
(414)276-1076

s/ Jonathan D. Orent

MOTLEY RICE LLC
Jonathan D. Orent (WI State Bar No. 1062035)
Attorneys for Plaintiff
321 South Main Street
P.O. Box 6067
Providence, RI 02940-6067
(401) 457-7700